

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Civil Action No. 6:21-cv-00361-ADA

**DEFENDANT DELL TECHNOLOGIES INC.'S UNOPPOSED MOTION FOR A
SECOND EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Dell Technologies Inc. ("Dell") files this unopposed motion for a second extension of time to move, answer or otherwise respond to Plaintiff Sonrai Memory Limited's ("Plaintiff") Complaint (ECF No. 1). This motion seeks an 18-day extension of time for Dell to move, answer or otherwise respond to the Complaint for patent infringement filed on April 12, 2021.

Dell previously moved this Court for extension of its deadline to answer or otherwise respond to the Complaint and that request was granted on May 20, 2021. Dell's time to answer or otherwise respond to the Complaint is, therefore, currently due on June 11, 2021. With the requested 18-day extension, Dell's answer or other response would be due on June 29, 2021.

This motion is not brought for the purpose of delay. Rather, this extension is necessary for Dell to hire counsel and investigate the technology accused of infringement.

Counsel for Dell has communicated with Plaintiff's counsel. This motion is stipulated by the Parties. Accordingly, Dell requests the Court grant the foregoing motion and enter an Order extending Dell's deadline to answer or otherwise respond to the Complaint to June 29, 2021.

Dated: June 1, 2021

Respectfully submitted,

By: /s/ Michael J. Newton

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on June 1, 2021.

/s/ Michael J. Newton

Michael J. Newton